

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION E-4760

March 17, 2016

R E S O L U T I O N

Resolution E-4760. Requiring Pacific Gas and Electric, Southern California Edison, and San Diego Gas & Electric to collect the Contractors State License Board number from NEM applicants and distribute the information to the California Solar Statistics contractor.

PROPOSED OUTCOME:

- The IOUs shall add CSLB # to the fields collected from NEM interconnection applications.
- The IOUs shall include CSLB # in their regular data submissions to the CSS contractor.
- The CSS contractor shall include CSLB # in the published NEM data.

SAFETY CONSIDERATIONS:

- The Contractors State License Board protects consumers by regulating the construction industry through policies that promote the health, safety, and general welfare of the public in matters relating to construction. While not the motivation for this resolution, collecting the CSLB number for NEM installations, when applicable, provides a consumer protection measure for NEM customers.

ESTIMATED COST:

- The IOUs may experience some nominal cost impacts in complying with this requirement to update their NEM interconnection online system.

On the Commission's own motion, as established by Conclusion of Law # (CoL) 9 of Decision (D.) 14-11-001, issued November 6, 2014.

SUMMARY

This Resolution orders the utility interconnection departments at PG&E, SCE and SDG&E to add Contractors State License Board number (CSLB #) and the option to indicate that the installer does not have a valid contractor's licence to the fields collected from Net Energy Metering (NEM) interconnection applications. It also orders the interconnection departments to include CSLB # when available, or state that the applicant indicated "not applicable" for that field in their regular data submissions to the California Solar Statistics (CSS) contractor. Finally, it requires that the CSS contractor include CSLB # in the published NEM data. Pursuant to D.14-11-001 (CoL 9), Energy Division may propose these changes to the NEM interconnection application fields and program reporting requirements.

BACKGROUND

Policy Context

Since its inception, the California Solar Initiative (CSI) has collected valuable data about customer-sited solar photovoltaic systems. The CSI program has provided this information to the Commission, the CSI program administrators, market participants, researchers, and the general public. California Solar Statistics (CSS)¹ compiles CSI data and publishes anonymized system information related to size, make, model, location, cost, expected performance, etc. Among other things, these data help researchers better understand the diffusion of this technology, they help utility planners understand the grid and resource impacts of these distributed generation fleets, and they help potential system owners understand which installers are active in their areas.

The CSI program requires that installers be appropriately licensed by the Contractors State Licensing Board, and that applicants provide CSLB # on their application forms. The CSLB # provides definitive identification of contractors, and thus has helped maintain the quality of the CSI database.

Procedural Background

¹ <https://www.californiasolarstatistics.ca.gov/>

As the CSI incentive funds became depleted, an increasing share of customer-sited renewable generation facilities began to be installed without going through the CSI application process. In order to continue collection of the data for CSS through a new process, the Commission issued Decision (D.) 14-11-001, which ordered the investor-owned electric utilities to update the NEM interconnection application to include additional data fields. The decision listed the required fields² and ordered the electric utilities to transfer these data to the CSS contractor³ on a regular basis for processing and posting to the CSS website. Significantly, the decision also provided that "...the Energy Division may issue a [draft] resolution if it believes changes should be made with respect to the fields which must be collected in the NEM application and the fields which must be supplied to the California Solar Statistics contractor."⁴

DISCUSSION

The Collection of CSLB # in NEM Applications will Improve the Quality of Publicly Available NEM Data

In addition to information about the host customer and the system that has been installed, the utility is required to provide to the CSS contractor information about the NEM system installer, including name, city, ZIP code, and phone number. However, there is no current requirement to provide the installer's CSLB # to the CSS contractor. Unfortunately, the quality of the published customer data suffers as a result of the lack of this identifier. For example, the published NEM datasets contain numerous examples of companies whose names are spelled in various ways in different NEM applications (see the Appendix). It is not surprising that this can lead to confusion when researchers or potential customers are seeking information about the work history of a given contractor.

² The fields are listed in Table 1 of D.14-11-001.

³ Currently the CSS contractor is Energy Solutions.

⁴ Conclusion of Law (CoL) #9 of D.14-11-001.

For this reason, the Commission believes that inclusion of CSLB #, when available, for NEM applications will provide a meaningful increase in the quality of data that is published on the CSS website. The data quality should improve substantially because each installer who is registered with CSLB has just one CSLB #, and its name in the CSLB registry is spelled in only one way.

It should be noted that this Resolution does not require that all NEM installers have CSLB numbers, as it is not a requirement for customers participating in the NEM tariff to use installers that have a valid contractor's license, as it was for the CSI Program (unless the system was self-installed). Whether NEM applications should require that non-self-installers have a CSLB # is a question we may consider in a formal proceeding. Rather, we will require that if the installer has a CSLB #, then it must be provided in the NEM application form. In other words, the utility's NEM application should include an option for the applicant to indicate that the installer does not have a valid contractor's license.

In conjunction with requiring that each utility add the CSLB # field, when available, to its NEM application, we require that the utility interconnection department supply the CSLB # (if the installer has one) as part of the regular reporting to the CSS contractor, and that the CSLB # be reported to the public through the CSS portal.

As with other NEM data collected by the utilities, the utilities are not responsible for collecting data from applications which were submitted prior to the date that the fields were required on NEM applications, and as with installation contracts, the utilities are not responsible for validating the CSLB #.⁵

The Commission recognizes the need to avoid unnecessary and burdensome reporting requirements, but believes that the changes ordered in this resolution are reasonable, necessary (in the effort to improve data quality), and not overly burdensome.

1. ⁵ Decision (D.) 14-11-001 pages 9-10 and Conclusions of Law 4 and 5.

COMMENTS

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

Two parties filed timely comments, PG&E and SCE. Both sets of comments requested three modifications: (1) that the resolution be clarified to indicate that the NEM applicant may enter “not applicable” in those cases where the contractor does not have a CSLB #, (2) that the utility not be required to validate the data supplied by the applicant, and (3) that the utility not be required to collect data retroactively. We find these clarifications reasonable and they are accordingly integrated into the foregoing text. In addition, PG&E requests that the compliance deadline for modifications to the NEM data collection interface be extended from 60 days to 120 days, citing numerous changes which the NEM interface is concurrently undergoing. Supporting as light an administrative burden as possible, we find this request to be reasonable and incorporate it as well.

FINDINGS

1. Decision (D.) 14-11-001 established that the Energy Division may "...issue a resolution if it believes changes should be made with respect to the fields which must be collected in the NEM application and the fields which must be supplied to the California Solar Statistics contractor."
2. Data quality issues have arisen which are related to the identity of system installers.
3. Data quality issues can be significantly ameliorated by the inclusion of CSLB #, when available, on the NEM application forms.
4. It is reasonable to require each utility to collect CSLB #, with the understanding that no CSLB # information will be collected from NEM applicants when they indicate that their installers do not have a CSLB #. Where there is no CSLB # associated with a NEM application, applicants must indicate that the installer does not have a valid CSLB #.
5. If the installer has a CSLB # and it is provided by the applicant, it is reasonable to require each utility to supply a CSLB # for each NEM system to the California Solar Statistics contractor. Where there is no CSLB # associated with a NEM application as provided by the applicant, each utility will indicate that the field is not applicable.

THEREFORE IT IS ORDERED THAT:

1. Within 7 days of the date of this Resolution, the California Solar Initiative program administrators shall authorize the California Solar Statistics contractor to begin to work expeditiously to include Contractors State License Board # in the published Net Energy Metering data, when the Contractors State License Board # data become available from the IOUs.
2. Within 45 days of the date of this Resolution, Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E) shall begin to provide the California Solar Statistics contractor with the Contractors State License Board #, in those cases where the utility interconnection department has the Contractors State License Board # for a given application.
3. Within 120 days of the date of this Resolution, PG&E, SCE, and SDG&E shall require the collection, in the Net Energy Metering application process, of Contractors State License Board # of the system installers for those systems where the installer has a Contractors State License Board #.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on March 17, 2016; the following Commissioners voting favorably thereon:

/s/ Timothy J. Sullivan
TIMOTHY J. SULLIVAN
Executive Director

MICHAEL PICKER
President
MICHEL PETER FLORIO
CATHERINE J.K. SANDOVAL
CARLA J. PETERMAN
LIANE M. RANDOLPH
Commissioners

APPENDIX A

One example of multiple spellings for an individual installer in the NEM database.

The following list of spellings was taken from the “Currently Interconnected Data Set”⁶ on January 6, 2016:

1st
1st Light Energy
1st Light Emergu
1st Light Energyry Inc.
1st Light Energy
1st Light Energy In
1st Light Energy Inc
1st Light Energy Inc.
1st Light Energy Systems
1st Light Energy, Inc
1st Light Energy, Inc.
1st Light Energy., Inc
1st Light Energy
1st LIGHT SOLAR
1st Light Solar Energy
1st Light Solar Energy, Inc.
1St. Light Energy
1st. Light Energy Inc.

⁶ https://www.californiasolarstatistics.ca.gov/data_downloads/